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October 25, 2000

**By Hand**

David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: General Docket Addressing Rural Universal Service  
Docket No. 00-00523

Dear Mr. Waddell:

Enclosed for filing in the above-captioned proceeding are an original and thirteen copies of AT&T's Issues List in the above-captioned proceeding.

If you have questions, please call me.

Sincerely,

Jim Lamoureux

Encls.

**BEFORE THE  
TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee**

**In the Matter of:**

<b>Generic Docket Addressing</b>	)	
<b>Rural Universal Service</b>	)	<b>DOCKET NO. 00-00523</b>
	)	
	)	

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**AT&T COMMUNICATIONS OF THE  
SOUTH CENTRAL STATES, INC.'S  
ISSUES LIST**

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On July 14, 2000, the Tennessee Regulatory Authority ("TRA") issued an Order Opening Docket for Purpose of Addressing Rural Universal Service and Appointing Hearing Officer. On October 19, 2000, the TRA issued its Notice of Status Conference, requesting parties to file a List of Issues to be addressed in this proceeding. As such, AT&T Communications of the South Central States, Inc. hereby submits its Issues List as follows:

1. Is a universal service high cost subsidy fund needed at this time for areas served by rural carriers? If no, when would such a fund be needed?
2. Should current earnings be considered when determining the need for a high cost subsidy fund?
3. Should current earnings be considered when determining the size of a high cost subsidy fund for rural carriers?
4. What cost model/methodology should be adopted to calculate high cost subsidy support for rural carriers?
5. What are the appropriate inputs for the cost model/methodology?

6. How should subsidy needs be determined for areas served by rural carriers?
7. What procedures should be used to establish portable per line support available to all eligible telecommunications carriers? Should, and if yes, how should support be targeted in rural areas?
8. Must a rural carrier waive the rural exemption prior to the establishment of a rural high cost subsidy fund?
9. Must a rural carrier provide unbundled network elements prior to the establishment of a rural high cost subsidy fund?
10. If a rural ILEC is over-earning, what rates should be reduced prior to the consideration of high cost subsidy support?
11. Should intrastate switched access rates be reduced once a high cost subsidy fund is established?

This 25th day of October, 2000.


A handwritten signature in cursive script, reading "James P. Lamoureux", is written over a horizontal line. To the right of the signature, the words "my for" are written in a smaller, less legible cursive script.

James P. Lamoureux, Esq.  
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Attorney for AT&T Communications of the  
South Central States, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 25th, 2000, AT&T's Issues List in Docket 00-00523 was served upon the parties of record by placing a copy of the same in the United States Mail postage prepaid and addressed as follows:

  
\_\_\_\_\_  
Jim Lamoureux  
*as for*